UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

MAR 0 2 2009

(AE-17J)

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Tony Hill
Regulatory Compliance Coordinator
Olmsted Waste-to-Energy Facility
Olmsted County Public Works
2122 Campus Drive SE, Suite 200
Rochester, Minnesota 55904

Dear Mr. Hill:

Enclosed is an executed copy of an Administrative Order between the Olmsted Waste-to-Energy Facility (OWEF) and the Environmental Protection Agency. This Order resolves the December 22, 2008, Finding of Violation that was issued to OWEF. If you have any questions regarding the Order, please contact Charles Hall of my staff at (312) 353-3443.

Thank you for your cooperation.

Sincerely,

William L. MacDowell

William L. MacDowell, Chief
Minnesota/Ohio Air Enforcement and Compliance Assurance Section

cc: Jeff T. Connell, Minnesota Pollution Control Agency

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

IN THE MATTER OF:	)	**Administrative Consent Order**
	)	
Olmsted Waste-to-Energy Facility Rochester, MN	)	**EPA-5-09-113(a)-MN-02**
	)	
Proceeding pursuant to Sections 113(a)(3) and 114(a) of the Clean Air Act, 42 U.S.C. §§ 7413(a)(3) and 7414(a)(1).	)	

Administrative Consent Order

1. The Director of the Air and Radiation Division, United States Environmental Protection Agency (EPA), Region 5, is issuing this Administrative Consent Order ("Administrative Order" or "Order") to the Olmsted Waste-to-Energy Facility (OWEF) pursuant to Sections 113(a)(3) and 114(a)(1) of the Clean Air Act ("CAA" or "the Act"), 42 U.S.C. §§ 7413(a)(3) and 7414(a)(1).

Statutory and Regulatory Background

2. Pursuant to Sections 111 and 129 of the Act, the Administrator promulgated the Federal Plan Requirements for Small Municipal Waste Combustion (MWC) Units Constructed On or Before August 30, 1999, 40 C.F.R. 62, Subpart JJJ (hereinafter, the Small MWC FIP) at 40 C.F.R. §§ 62.15000 through Part 15410. The Small MWC FIP applies to municipal waste combustion units with the capacity to burn between 50 and 250 tons of municipal solid waste (MSW) per day. A Small Class II MWC Unit is located at a MWC plant with aggregate plant combustion capacity less than or equal to 250 tons per day of municipal solid waste.

3. Pursuant to 40 C.F.R. § 62.15275(c), OWEF must continuously monitor a selected operating parameter during all periods when the municipal waste combustion unit is operating and combusting waste, and must calculate the 8-hour block average carbon feed rate in kilograms (or pounds) per hour, based on the selected operating parameter. OWEF's selected operating parameter has been the Powdered Activated Carbon (PAC) injection rate.

4. Pursuant to 40 C.F.R. § 62.15310(a)(3), the owner or operator of a Small MWC Unit must keep records of all 8-hour block average carbon feed rates from the monitored operating parameter.

5. Pursuant to Section 113(a)(3) of the Act, 42 U.S.C. § 7413(a)(3), the Administrator of EPA may issue an order requiring compliance to any person who has violated or is

violating the Small MWC FIP. The Administrator has delegated this authority to the Regional Administrator, EPA, Region 5, who has re-delegated this authority to the Director of the Air and Radiation Division.

6. The Administrator of EPA may require any person who owns or operates an emission source to keep records on control equipment parameters, production variables, or other indirect data when direct monitoring of emissions is impractical, under Section 114(a)(1) of the Act, 42 U.S.C. § 7414(a)(1). The Administrator has delegated this authority to the Regional Administrator, EPA, Region 5, who has re-delegated this authority to the Director of the Air and Radiation Division.

Findings

7. OWEF owns and operates Waste Combustor Unit 2 (Unit 2), a Small Class II municipal waste combustor located at 301 Silver Creek Road NE, Rochester, Minnesota.

8. Unit 2 is a 100-ton per day mass-burn, waterwall municipal waste combustion unit. Construction of Unit 2 commenced on or before August 30, 1999. The Minnesota Pollution Control Agency has not submitted to EPA a CAA Section 111(d) plan for small municipal waste combustion units constructed on or before August 30, 1999. Therefore, Unit 2 is subject to the Small MWC FIP at 40 C.F.R. §§ 62.15275(c) and 62.15310(a)(3).

9. OWEF owns or operates an "emission source" within the meaning of Section 114(a)(1) of the Act, 42 U.S.C. § 7414(a)(1). Therefore, OWEF is subject to the requirements of Section 114(a)(1).

10. On December 22, 2008, EPA issued to OWEF a Finding of Violation alleging that OWEF violated the Small MWC FIP by failing to continuously monitor the PAC injection rate operating parameter during all periods when the MWC unit was operating and combusting waste, and by failing to record the 8-hour block average carbon feed rates during this time.

11. On January 21, 2009, representatives of OWEF and EPA held a conference to discuss the December 22, 2008, Finding of Violation.

Compliance Program

12. By the effective date of this Order, OWEF must achieve, demonstrate, and maintain compliance with the Small MWC FIP at its Rochester, Minnesota facility.

13. During each mercury and dioxin/furan performance test, OWEF will determine the average PAC feed rate in pounds per hour (lbs/hr).

14. OWEF will monitor the activated carbon injection feed rates of its MWC units hourly to ensure appropriate PAC flow.

15. OWEF must maintain a PAC feed rate average at or above the highest average level established during the most recent mercury and dioxin/furan test.

16. During all periods when the MWC unit is operating and combusting waste, OWEF will calculate and keep records of all 8-hour block average carbon feed rates in pounds per hour. When calculating the 8-hour block average, OWEF will:

    (1) Exclude hours when the MWC unit is not operating.

    (2) Include hours when the MWC unit is operating but the minimum amount of carbon feed rate data required was not collected; and

    (3) Provide reasons OWEF did not collect the minimum data.

17. On January 20, 2009, OWEF provided EPA with a detailed description of the corrective and preventative actions – as new procedures and technical changes – that OWEF has implemented and incorporated into its PAC monitoring system since the violation (Attachment 1). OWEF must adhere to these actions to demonstrate compliance with this Administrative Order until this Administrative Order terminates.

18. Adherence to the corrective and preventative actions set forth in this Administrative Order and Attachment 1 shall not prohibit OWEF from making further improvements to the PAC monitoring system while the Administrative Order is in effect. However, prior to implementing additional changes to the current PAC monitoring system, OWEF must notify EPA of its proposed actions in writing at least fifteen (15) days prior to implementing such changes. In such notification, OWEF shall describe the proposed changes with reasonable specificity. OWEF shall not propose any changes to the current PAC monitoring system that would increase the likelihood of future violations of the Small MWC FIP.

19. OWEF shall keep records required to demonstrate compliance with this Administrative Order until this Administrative Order terminates. Such records shall include at a minimum the following information:

    1. Average PAC feed rate in pounds per hour during all stack tests for Mercury and Dioxin/Furan emissions. OWEF shall include supporting CEM / Distributive Control System (Delta V);

    2. All 8-hour arithmetic block average carbon feed rates in pounds per hour calculated from the monitored operating parameter;

3. Total PAC purchased and delivered to OWEF for each calendar quarter. OWEF shall include supporting documentation.

20. At the end of each calendar quarter while this Administrative Order is in effect, OWEF shall report:

1. The average PAC feed rate recorded during the most recent Mercury and Dioxin/Furan performance test;

2. The lowest 8-hour block average carbon feed rate in kilograms (or pounds) per hour;

3. The total PAC used each calendar quarter.

21. OWEF must send all reports required by this Order no later than 30 days after the end of each calendar quarter to:

Attention: Compliance Tracker (AE-17J)
Air Enforcement and Compliance Assurance Branch
EPA, Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604.

General Provisions

22. This Order does not affect OWEF's responsibility to comply with other local, state, and federal laws and regulations.

23. This Order does not restrict EPA's authority to enforce Section 112 of the Act, or any other section of the Act.

24. Nothing in this Order limits EPA's authority to seek appropriate relief, including penalties under Section 113 of the Act, 42 U.S.C. § 7413, for OWEF's violation of the Small MWC FIP.

25. Failure to comply with this Order may subject OWEF to penalties of up to $32,500 per day for each violation under Section 113 of the Act, 42 U.S.C. § 7413, and 69 Fed. Reg. 7121 (Feb. 13, 2004)(amending 40 C.F.R. Part 19).

26. The terms of this Order are binding on OWEF, its assignees and successors. OWEF must give notice of this Order to any successors in interest, prior to transferring ownership, and must simultaneously verify to EPA, at the above address, that OWEF has given such notice.

27. This Order is not subject to the Paperwork Reduction Act, 44 U.S.C. § 3501 et seq., because it seeks collection of information by an agency from specific individuals or entities as part of an administrative action or investigation. To aid in our electronic record keeping efforts, please provide the information required under this Order without staples. Paper clips, binder clips, and 3-ring binders are acceptable.

28. EPA may use any information submitted under this Order in an administrative, civil or criminal action.

29. OWEF agrees to the terms of this Order.

30. Each person signing this Administrative Order certifies that he or she has the authority to sign for the party whom he or she represents and to bind that party to the terms and conditions of this Administrative Order.

31. This Administrative Order is effective on the date of signature by the Director of the Air and Radiation Division. This Order shall terminate one year from the effective date, provided that OWEF has complied with all terms of the Order throughout its duration.

2/6/09
Date

Michael Cousino, Director
Olmsted County Public Works Department

3/2/09
Date

Cheryl L. Newton
Director
Air and Radiation Division

Attachment

ATTACHMENT 1

COUNTY OF Olmsted

JAN 27 2009

PUBLIC WORKS DEPARTMENT
2122 CAMPUS DR SE - SUITE 200
ROCHESTER MN 55904-4744
www.olmstedpublicworks.com
507.328.7070

January 20, 2008

Mr. Charles Hall
United States Environmental Protection Agency
Region 5
77 West Jackson Boulevard
Chicago, Il 60604-3590

RE: Finding of Violation
Olmsted Waste-to-Energy Facility

Dear Mr. Hall:

On December 26, 2008, Olmsted County received a Finding of Violation (FOV) notice indicating that the Olmsted Waste-to-Energy Facility (OWEF) had violated 40 C.F.R. 62.15275(c) and 62.15310(a)(3) of the Small MWC FIP between July 24 through August 12, 2005, by failing to meet monitoring and recordkeeping requirements of the facility's operating parameters. On Wednesday, January 21, 2008, a conference is scheduled between Olmsted County staff and U.S. EPA and MPCA personnel to discuss the FOV. Olmsted County appreciates the opportunity to present information related to the findings outlined in the FOV, and to share with you the actions the OWEF has undertaken to prevent future problems with the mercury and PCDD/PCDF additive control system.

As noted in the FOV, on July 24, 2005, OWEF personnel unknowingly, improperly placed the chute of a PAC bag on the hopper level indicator thereby producing a high hopper level reading on the Distributive Control System (DeltaV) when in fact there was no PAC flowing into the hopper. In addition, OWEF staff failed to verify PAC flow by visually looking in the eductor for flow during normal hourly inspections of the activated carbon injection (ACI) system. The following corrective actions were taken by the OWEF:

1. Immediately instituted a visual inspection of the PAC flow that was done at the educator of both PAC units during each shift and inspections logged on the Remarks log in the Control Room.
2. Counseled all Shift Supervisors as to the requirements of adding PAC to the fabric filter no later than 9/2/05.
3. Reviewed the proper procedure to change a PAC bag with the Shift Supervisors no later than 9/2/05.

In addition to implementing the corrective measures noted above, OWEF staff and the County's Regulatory Compliance Unit created an action plan for developing a more thorough, rigorous, and redundant system to monitor and record the amount of PAC used by the ACI system. It should be noted that the Regulatory Compliance Unit is a distinct office within the Olmsted County Solid Waste Division that is separate from facility management. This unit is responsible for verifying that the County's solid waste facilities maintain full compliance with all federal, state, and local environmental

requirements. Regulatory compliance staff ensures that the County's solid waste management facilities maintain compliance with all applicable environmental regulations through on-site inspections, permit compliance audits, and environmental monitoring activities. Included with this letter is a technical document that provides a more detailed explanation of the new procedures and technical changes to the PAC monitoring system. The following is a summary of the mechanical, software, procedural, and graphical user interface changes that were made to the ACI system, DeltaV, and the regulatory compliance data acquisition and handling system (RegPerfect) at the facility (*please note: the year these changes were completed are provided in parenthesis after each action item*):

- Vashay scales with LCP-104 software systems were installed at each ACI system in order to provide accurate PAC bag weight measurements for assisting OWEF staff in verifying that PAC is being injected into the hopper. Visual displays showing the PAC bag net weight were also installed with the scales. (*2006*)
- Load cells were installed for the purpose of providing analog output signals from the scales to the DeltaV system for monitoring and recordkeeping purposes. (*2006*)
- A local audio and visual alarm system within the DeltaV system was created for providing a warning to the operators if there is no reduction in the weight of the PAC bags. This alarm occurs if the weight does not decrease by a certain amount (alarm is currently set at 0.2 pounds) over a settable time period (currently 13 minutes). The DeltaV alarm display will read "*NO RECENT PAC WT CHANGE*". (*2007*)
- An additional audio and visual alarm system within DeltaV is in place for providing a warning when no PAC is flowing to the hopper. This alarm occurs if the level sensor in the PAC hopper senses no PAC in the system. The DeltaV alarm display will read "*NO PAC IN HOPPER*". (*2007*)
- At each hour the operators record the weight that is shown on the local scale display, and perform a thorough visual inspection of the PAC flow which is done at the educator. Results of each inspection are recorded. (*2006*)
- Each time a PAC bag is changed on the ACI system, the operators record the bag weight obtained from the local scale display. Operators also perform a thorough inspection of the of bag connection and ensure PAC flow at the educator. (*2006*)
- The PAC rate that is displayed in the DeltaV system is passed through the network connection to the RegPerfect software for regulatory compliance tracking. The PAC rate is recorded as RPM converted to pounds per hour of screw feeder speed (sfs). The sfs is the operating parameter for calculating the mercury/PCDD/PCDF control additive feed rate as noted in the facility's current permit. (*2003*)
- On a quarterly basis, the PAC bag usage is monitored and documented by OWEF staff using actual bag weight from the PAC scales. An automated spreadsheet report is developed to provide quarterly usage values. This report takes into account the residual PAC that remained in the previous bag and contains the weight of the partial bags at the beginning and end of the quarter so that the total amount of PAC used can be calculated (see Attachment 1 in the enclosed technical document for further details). (*2007*)
- On a weekly basis, OWEF staff verifies the values obtained from analog output signal, the sfs, and overall PAC delivery ratios are accurate. Any deviations to the established values are documented and corrected (see Attachment 2 in the enclosed technical document for further details). (*2007*)

- On the first day of each month, OWEF staff verifies the average weight of each PAC bag that was used during the previous month. This is to assist in tracking the total amount of PAC used during each month and to verify the accuracy of vendor's invoices. The contractor bills the OWEF for 900 pound bag purchases (see Attachment 3 in the enclosed technical document for further details). (*2007*)
- During March of each year, the PAC scales are calibrated by an outside vendor to ensure their accuracy (see Attachment 4 in the enclosed technical document for further details). (*2006*)
- Each month the PAC scales are checked by OWEF staff to verify the scales linearity and results are documented (see Attachment 5 in the enclosed technical document for further details). (*2006*)

Again, the County looks forward to discussing with you the extensive efforts the OWEF has taken to improve the mercury and PCDD/PCDF additive control system at the facility. If you would like to discuss anything in this letter prior to our conference, please give me a call at (507) 328-7008.

Sincerely,

T Hill

Tony Hill
Regulatory Compliance Coordinator

DeltaV and RegPerfect Interfaces and Modifications to the PAC Software

January 13, 2009

This summary reflects the changes that were made to the Powdered Activated Carbon Delta V and RegPerfect procedures, interfaces and software. All the changes/modifications were implemented prior to December 31, 2007.

Outline of Regulatory Compliance for the PAC System

1. M-Drive

    - The M-Drives local display for the PAC System will be scaled in #/Hr.
    - The analog output signal from the M-Drives to DeltaV will also be scaled in #/Hr.

2. DeltaV

    - The analog input from the M-Drives will be scaled in #/Hr to match the M-Drives.
    - This value will be displayed on the DeltaV PAC screen as "M-DRIVE RATE".
    - This value will be stored by the DeltaV historian, for possible future use.
    - PAC Bag usage will be tracked behind the scenes using actual bag weight from the PAC scales. An automated spreadsheet report will be developed by the I&C Department to provide quarterly usage values **(See Attachment 1)**. This report will be located on the DeltaV Application Station for use by Regulatory Compliance staff. This report will take into account the residual PAC that remained in the previous bag. The report will also contain the weight of the partial bags at the beginning and end of the quarter so that the total amount of PAC used can be calculated.

3. RegPerfect

    - The M-Drive rate that is displayed in DeltaV will be written over the network connection to the RegPerfect software for regulatory compliance purposes.

4. Quality Control

    - During the first week of each quarter, a PM task will be generated in MP2 software to calibrate the M-Drive **(See Attachment 1 and 2)**. The I&C Department will be responsible for performing the following actions:

        - The measured weight data for the preceding quarter that is stored in DeltaV will be used to calculate the values used for this calibration.
        - Adjustments will be made as needed to the local M-Drive scaling.
        - Adjustments will then be made to DeltaV in order to match the new scaling of the M-Drive.
        - The record of these changes will be scanned and placed in an electronic folder that will be available for Regulatory Compliance staff.

    - On the first day of each month, a PM task will be generated in MP2 software to verify the average PAC bag weight is determine for the previous month **(See Attachment 3)**. The I&C Department will be responsible for performing the following actions:

        - Using the measured weight data that is stored in the DeltaV system, determine the adequacy of the previous month's PAC bag weights.
        - Notify the Regulatory Compliance Coordinator if any single bag is outside of the following tolerance: -5% to +10%, or if the average bag weight for the month is outside of the following tolerance: ±5%.

    - During March of each year, a PM task will be generated in MP2 software to calibrate the PAC scales **(See Attachment 4)**. The Maintenance Coordinator will be responsible for performing the following actions:

        - Schedule an independent scale testing contractor to calibrate the PAC scales.
        - Keep all maintenance records.

    - On the first day of each month, a PM task will be generated in MP2 software to verify the PAC scale linearity **(See Attachment 5)**. The Operations Department will be responsible for performing the following actions:

- An Operator will be directed by the Shift Supervisor to record the weight of each local PAC System display.
- This same Operator will place a certified 25# weight on the scale and record the weight shown on the local display.
- The Operator will subtract the 2 weights and verify the difference is less than ±0.5#.
- If the error is greater than 1#, the Operator will notify the Shift Supervisor, who will create a work request in MP2 for the Maintenance Coordinator to correct the linearity of the scale.

Outline of Engineering Controls for the PAC System

1. PAC Scales

    - Each local PAC scale display will show the net weight of each PAC bag.
    - The analog output signal from the scales to DeltaV will also be scaled in net weight.

2. DeltaV

    - The analog input from the PAC scales will be scaled in net weight to match the local scale display.
    - This value will be displayed on the DeltaV PAC screen as "CURRENT WT".
    - This value will be stored by the DeltaV historian, for possible future use.
    - The DeltaV system will provide 2 alarms related to the PAC feed:
        - The first alarm will be identified as "NO RECENT PAC WT CHANGE" on the display screen. This alarm occurs if the weight does not decrease by a settable amount in a settable time period.
        - The second alarm will be named "NO PAC IN HOPPER". This alarm occurs if the level sensor in the PAC hopper senses no PAC in the system.

Outline of Changes to DeltaV Operator Screens

1. The Plant Engineer will be responsible for overseeing the changes to the DeltaV operator screens. The following changes will be performed by Novaspect personnel:

    - The DeltaV operator screen named "OLM_PAC_DATA" will be removed from DeltaV and saved in an offline DeltaV folder.
    - The following modifications will made to the DeltaV operator screen named "OLM_PAC":
        - "FLOW RATE" will be removed from the screen.
        - "M-DRIVE RATE" will be modified to display #/Hr instead of RPM.
        - "PROJ FLOW RATE" will be removed from the screen.
        - "CURRENT WT" shall remain on the screen with no changes.
        - The net weight and 8 hour block averages displayed on the screen will be removed.
        - The INIT CALC button will be removed from the screen.

Outline of Changes to DeltaV Software

1. The Plant Engineer will be responsible for overseeing all the changes to the Delta V software.
2. Software will be modified or removed by Novaspect to support the required changes to DeltaV.
3. Any control module that is no longer needed will be placed in an offline DeltaV folder.

Outline of Changes to DeltaV Application Station Reports

1. The I&C Department will be responsible for the following modifications to the DeltaV Application Reports:

    - PAC bag usage and bag weight reports will be created on the Application Station for regulatory compliance purposes.

Attachment 1

Task Report (Full List)

Task No. IC-PAC-05
Description QUARTERLY PM FOR PAC CONTROLS
Assigned To 4431 **Priority** 2.00
WO Type PM-Q **Multitask** Yes
Expense Class BMNP **In-service Task** Yes

Craft	Crew Size	Estimated Labor Hours
I&C	2.00	1.00

Equipment No. PAC-1SYS-IC
Equipment Description #1 POWDER ACTIVATED CARBON SYS CONTROLS
Location OWEF **Perform Every** 3.00 Month(s)
Building BLD13 WP **Schedule Type** Fixed
Elev/Floor 1015 **Task Duration**
Room/Area - **No. of Times Completed** 4.00
Date Last Performed 1/ 2/2009 **Down Time**
Next Due Date 4/ 1/2009 **Must Be Down** No
Tenant

Equipment No. PAC-2SYS-IC
Equipment Description #2 POWDER ACTIVATED CARBON SYS CONTROLS
Location OWEF **Perform Every** 3.00 Month(s)
Building BLD13 WP **Schedule Type** Fixed
Elev/Floor 1015 **Task Duration**
Room/Area - **No. of Times Completed** 4.00
Date Last Performed 1/ 2/2009 **Down Time**
Next Due Date 4/ 1/2009 **Must Be Down** No
Tenant

Equipment No.	Meter Name	Last Performed At

Procedure for Quarterly PAC PM

1. Generate PAC feed rate and usage reports for the preceding quarter from the DeltaV application station.
2. Rescale the PAC feed rate if the feed rate from the reports deviates by more than +7% or -5%.
3. Following the proper instructions, rescale the Contrex M-Drive for each boiler to match the calculated feed rate.
4. Following the proper instructions, rescale the DeltaV system to match the Contrex M-Drive for each boiler.
5. Complete this form and all supporting documents.
6. Scan the PAC usage report and move to folder (T:\Owefpub\Regulatory Compliance\PAC\Quarterly QAQC Reports).
7. Notify the Regulatory Compliance Coordinator when the report is finished.
8. Attach this procedure, all generated reports, rescaling calculations and all supporting documents to the completed PM and file in the Instrument shop records.

Contrex M-Drive Rescaling Instructions

1. View and record the "as found" feed rate by pressing the Set Speed button.
2. View and record the "as found" feeder RPM speed by pressing the Tach button.
3. Remove the keypad lockout jumper from J4 terminals 1&2.
4. Press the code select key.
5. Enter parameter 20 (Eng. Units-Pri. Sp.).
6. Press the enter key.
7. View and record the "as found" scaling parameter.
8. Enter and record the new "as left" scaling parameter.
9. Press the enter key.
10. Install the keypad lockout jumper on terminals 1&2 of J4.
11. View and record the "as left" feed rate by pressing the Set Speed button.
12. View and record the "as left" feeder RPM speed by pressing the Tach button.

DeltaV PAC Feed Rate Rescaling Instructions

1. Log onto the ProPlus computer as an administrator.
2. Open the appropriate module (1-FI-920 or 2-FI-920) off-line in control studio.
3. Click on the AI block in the right-pane window.
4. Double-click the parameter in the lower left-pane labeled OUT_SCALE.
5. Change the value in the 100% field to match the new scaling parameter used in the M-Drive.
6. Click the OK button to close. Record the "as found" and "as left" OUT_SCALE value.
7. Save the module.
8. Download the module.
9. Close control studio.
10. Download cold restart memory.

	As Found	As Left
PAC #1 M-Drive Feed Rate		
PAC #1 M-Drive RPM		
PAC #1 M-Drive Scaling Factor		
PAC #1 DeltaV OUT_SCALE Value		
PAC #2 M-Drive Feed Rate		
PAC #2 M-Drive RPM		
PAC #2 M-Drive Scaling Factor		
PAC #2 DeltaV OUT_SCALE Value		

Technicians: _____ Date: _____

_____

Olmsted County Waste to Energy
Powdered Activated Carbon Usage Report

First Quarter: Jan - Mar, 2008

Unit 1

Bag Number	Start Weight	End Weight	Delivered Weight	End of Bag Time
1	708	0	708	1/11/08
2	1004	0	1004	1/25/08
3	880	0	880	2/6/08
4	961	0	961	2/18/08
5	945	0	945	3/1/08
6	910	0	910	3/13/08
7	904	0	904	3/26/08
8	849	826	23	4/1/08

Unit 1 Quarterly Total Weight: 6335 lb

Unit 2

Bag Number	Start Weight	End Weight	Delivered Weight	End of Bag Time
1	119	0	119	1/2/08
2	975	0	975	1/16/08
3	947	0	947	1/29/08
4	999	0	999	2/12/08
5	975	0	975	2/26/08
6	964	0	964	3/27/08
7	955	613	342	4/1/08

Unit 2 Quarterly Total Weight: 5321 lb

Attachment 2

Task Report (Full List)

Task No. IC-PAC-03
Description WEEKLY PM FOR PAC CONTROLS
Assigned To 4431 **Priority** 2.00
WO Type PM-W1 **Multitask** Yes
Expense Class BMNP **In-service Task** Yes

Craft	Crew Size	Estimated Labor Hours
I&C	1.00	0.25

Equipment No. PAC-1SYS-IC
Equipment Description #1 POWDER ACTIVATED CARBON SYS CONTROLS
Location OWEF **Perform Every** 1.00 Week(s)
Building BLD13 WP **Schedule Type** Fixed
Elev/Floor 1015 **Task Duration**
Room/Area - **No. of Times Completed** 48.00
Date Last Performed 1/ 5/2009 **Down Time**
Next Due Date 1/12/2009 **Must Be Down** No
Tenant

Equipment No. PAC-2SYS-IC
Equipment Description #2 POWDER ACTIVATED CARBON SYS CONTROLS
Location OWEF **Perform Every** 1.00 Week(s)
Building BLD13 WP **Schedule Type** Fixed
Elev/Floor 1015 **Task Duration**
Room/Area - **No. of Times Completed** 48.00
Date Last Performed 1/ 5/2009 **Down Time**
Next Due Date 1/12/2009 **Must Be Down** No
Tenant

Equipment No.	Meter Name	Last Performed At

Procedure for Weekly PAC PM

1. Obtain a copy of the weekly PAC report for the preceding week from the DeltaV application station.
2. Confirm the values listed below are in the correct range for both MSW boilers:

    - M-Drive setpoint: 3.0 except 2.7 during stack testing
    - Total run hours: 168 hours except for boiler being off-line & bag changing
    - Total PAC delivered: 453.6# minimum for a normal 168 hour week
    - Actual delivery rate: 2.70#/hr minimum
    - Delivery ratio: 0.900 to 1.150

3. If any of the above values are not in the correct range, manually check the report for accuracy.
4. If errors are discovered in the report, notify the I&C Supervisor.
5. If the report is correct and the values are outside of the correct range, contact the I&C supervisor immediately for further instructions.
6. If the I&C Supervisor can not be reached contact the "ON-Call" manager for further instructions.
7. Explain any values outside the correct range and any corrective action taken in the comments section. Attach additional documentation as required.
8. Attach this procedure and the weekly PAC report to the completed PM and file in the I&C shop records.

Comments: _____

_____

_____

_____

_____

Technician: _____ Date: _____

Olmsted Waste to Energy
Powdered Activated Carbon Weekly Report

Enter Start Date:	1/20/08 12:00 AM
Enter End Date:	1/27/08 12:00 AM

Unit 1:

Average M-Drive Setpoir	3.0
Total Run Hours:	168.0
Total PAC Delivered:	497
Actual Delivery Rate:	2.96
Delivery:Setpoint Ratio:	0.986

Unit 2:

Average M-Drive Setpoir	3.0
Total Run Hours:	168.0
Total PAC Delivered:	513
Actual Delivery Rate:	3.05
Delivery:Setpoint Ratio:	1.028

Attachment 3

Task Report (Full List)

Task No.	IC-PAC-04		
Description	MONTHLY PM FOR PAC CONTROLS		
Assigned To	4431	**Priority**	2.00
WO Type	PM-M1	**Multitask**	Yes
Expense Class	BMNP	**In-service Task**	Yes

Craft	Crew Size	Estimated Labor Hours
I&C	1.00	0.50

Equipment No.	PAC-1SYS-IC		
Equipment Description	#1 POWDER ACTIVATED CARBON SYS CONTROLS		
Location	OWEF	**Perform Every**	1.00 Month(s)
Building	BLD13 WP	**Schedule Type**	Fixed
Elev/Floor	1015	**Task Duration**	
Room/Area	-	**No. of Times Completed**	11.00
Date Last Performed	1/2/2009	**Down Time**	
Next Due Date	2/7/2009	**Must Be Down**	No
Tenant			

Equipment No.	PAC-2SYS-IC		
Equipment Description	#2 POWDER ACTIVATED CARBON SYS CONTROLS		
Location	OWEF	**Perform Every**	1.00 Month(s)
Building	BLD13 WP	**Schedule Type**	Fixed
Elev/Floor	1015	**Task Duration**	
Room/Area	-	**No. of Times Completed**	11.00
Date Last Performed	1/2/2009	**Down Time**	
Next Due Date	2/7/2009	**Must Be Down**	No
Tenant			

Equipment No.	Meter Name	Last Performed At

Procedure for Monthly PAC PM

Bag Weight Report Instructions

1. Generate a monthly PAC bag weight report for the preceding month from the DeltaV application station.
2. Confirm the weight of each bag is within the following tolerance: +10% to -5%.
3. Confirm the average bag weight for each boiler is within the following tolerance +5% to -5%.
4. If any of the above values are not within tolerance, notify the Regulatory Compliance Coordinator.
5. Explain any action taken in the comments section. Attach additional documentation as required.

"NO RECENT PAC WT CHANGE" Alarm Testing Instructions

1. Notify the control room that this test is being conducted.
2. Open the detail faceplate in DeltaV for 1-WI-920.
3. Select simulate and confirm that the current bag weight is set as the simulated value.
4. Wait until the alarm comes in then remove the simulation.
5. Record the amount of time it took for the alarm to occur.
6. The alarm should take less than 15 minutes to become active.
7. Repeat this procedure for 2-WI-920.
8. If either alarm does not occur correctly notify the Instrument Supervisor.
9. Explain any problems in the comments section. Attach additional documentation as required.
10. Attach this procedure and the monthly PAC report to the completed PM and file in the Instrument shop records.

Time in minutes to alarm for 1-WI-920 _____

Time in minutes to alarm for 2-WI-920 _____

Comments: _____

_____

_____

_____

_____

Technician: _____ Date: _____

Olmsted County Waste to Energy
Powdered Activated Carbon Average Bag Weight Report

OWEF PAC Bags Used: 2/1/2008 to 3/1/2008

Unit 1

Bag Numbe	Bag Change Time	Start Weight
1	2/6/08 20:05	961
2	2/18/08 22:55	945

Unit 1 Average New Bag Weight: [redacted] lb

Unit 2

Bag Numbe	Bag Change Time	Start Weight
1	2/12/08 17:33	975
2	2/26/08 20:01	964

Unit 2 Average New Bag Weight: [redacted] lb

Color Code:	
Bag Wt >	990 lb
Bag Wt <	[redacted] lb
Average >	[redacted] lb
Average <	[redacted] lb

Attachment 4

Task Report (Full List)

Task No. MT-SC1000A1
Description PLANT SCALE ANNUAL CAL
Assigned To
WO Type PM-A1
Expense Class BMNP
Priority 3.00
Multitask Yes
In-service Task Yes

Craft	Crew Size	Estimated Labor Hours

Equipment No. AH-TROL-WEIGHT
Equipment Description ASH TROLLEY B WEIGHT CONTROLS
Location OWEF
Building BLD13WP
Elev/Floor 1015
Room/Area Ash Room
Date Last Performed 4/10/2008
Next Due Date 3/28/2009
Tenant
Perform Every 1.00 Year(s)
Schedule Type Duplicates
Task Duration
No. of Times Completed 2.00
Down Time
Must Be Down No

Equipment No. CT-LAB-SCALE
Equipment Description LAB SCALE
Location OWEF
Building BLD13 WP
Elev/Floor 1035
Room/Area Admin
Date Last Performed 4/10/2008
Next Due Date 3/28/2009
Tenant
Perform Every 1.00 Year(s)
Schedule Type Duplicates
Task Duration
No. of Times Completed 2.00
Down Time
Must Be Down No

Equipment No. CT-SCAL-INB
Equipment Description INBOUND REFUSE SCALE
Location OWEF
Building SCALE
Elev/Floor -
Room/Area -
Date Last Performed 4/10/2008
Next Due Date 3/28/2009
Tenant
Perform Every 1.00 Year(s)
Schedule Type Duplicates
Task Duration
No. of Times Completed 2.00
Down Time
Must Be Down No

Equipment No. CT-SCAL-LIME
Equipment Description LIME SCALE
Location OWEF
Building BLD13 WP
Elev/Floor 1015
Room/Area APC
Date Last Performed 4/10/2008
Next Due Date 3/28/2009
Tenant
Perform Every 1.00 Year(s)
Schedule Type Duplicates
Task Duration
No. of Times Completed 2.00
Down Time
Must Be Down No

Equipment No. CT-SCAL-OUTB
Equipment Description OUTBOUND REFUSE SCALE
Location OWEF
Building SCALE
Elev/Floor -
Room/Area -
Date Last Performed 4/10/2008
Next Due Date 3/28/2009
Tenant
Perform Every 1.00 Year(s)
Schedule Type Duplicates
Task Duration
No. of Times Completed 2.00
Down Time
Must Be Down No

Equipment No. PAC-1SYS-IC
Equipment Description #1 POWDER ACTIVATED CARBON SYS CONTROLS
Location OWEF
Perform Every 1.00 Year(s)

Task Report (Full List)

Building	BLD13 WP	**Schedule Type**	Duplicates
Elev/Floor	1015	**Task Duration**	
Room/Area	-	**No. of Times Completed**	2.00
Date Last Performed	4/10/2008	**Down Time**	
Next Due Date	3/28/2009	**Must Be Down**	No
Tenant			

Equipment No.	PAC-2SYS-IC
Equipment Description	#2 POWDER ACTIVATED CARBON SYS CONTROLS

Location	OWEF	**Perform Every**	1.00 Year(s)
Building	BLD13 WP	**Schedule Type**	Duplicates
Elev/Floor	1015	**Task Duration**	
Room/Area	-	**No. of Times Completed**	2.00
Date Last Performed	4/10/2008	**Down Time**	
Next Due Date	3/28/2009	**Must Be Down**	No
Tenant			

Equipment No.	Meter Name	Last Performed At

Task Instructions

Instruction Code SCALES **Date Last Edited** 7/14/2006

CONTRACT SCALE CALIBRATION ON THE FOLLOWING SCALES
1. TRUCK SCALES INBOUND
2. TRUCK SCALES OUTBOUND
3. TROLLEY B SCALES
4. PAC SCALES FEEDER #1
5. PAC SCALES FEEDER #2
6. LIME SCALE ON HOIST OF LIME FEEDER
7. PAC SAMPLE SCALE LOCATED OUTSIDE PAC ROOM.
8. LAB SCALE

Attachment 5

Task Report (Full List)

Task No. OP1-PAC-WEIGHTS
Description CHECK THE WEIGHTS OF THE PAC SCALES
Assigned To
WO Type PM-M1
Expense Class BOPS
Priority 3.00
Multitask Yes
In-service Task Yes

Craft	Crew Size	Estimated Labor Hours
SSUP		0.50

Equipment No. PAC-1FEEDER
Equipment Description #1 PAC FEEDER SYSTEM
Location OWEF
Building BLD13 WP
Elev/Floor 1015
Room/Area -
Date Last Performed 12/ 3/2008
Next Due Date 2/ 1/2009
Tenant
Perform Every 1.00 Month(s)
Schedule Type Duplicates
Task Duration
No. of Times Completed 23.00
Down Time
Must Be Down No

Equipment No. PAC-2FEEDER
Equipment Description #2 PAC FEEDER SYSTEM
Location OWEF
Building BLD13 WP
Elev/Floor 1015
Room/Area -
Date Last Performed 12/ 3/2008
Next Due Date 2/ 1/2009
Tenant
Perform Every 1.00 Month(s)
Schedule Type Duplicates
Task Duration
No. of Times Completed 26.00
Down Time
Must Be Down No

Equipment No.	Meter Name	Last Performed At

Item No.	Item Description	Stock Room	Qty	UOM	Required
PAC-25# WEIGHT	25# WEIGHT FOR CHECKING PAC SCALES	-	1.00	EACH	Yes

Task Instructions

Instruction Code PAC WEIGHT **Date Last Edited** 11/30/2007

UNIT #1.

1. RECORD THE PRESENT WEIGHT OF THE PAC.

2. TAKE THE 25# WEIGHT AND PUT IT ON THE PAC SKID.

3. AGAIN RECORD THE WEIGHT OF THE PAC SKID PLUS THE 25# WEIGHT.

4. SUBTRACT #3 FROM #1

5. IF THE DIFFERENCE IS LESS THAN 24# OR GREATER THAN 26# WRITE IT UP IN MP2 TO HAVE THE SCALES RECALIBRATED.

UNIT #2.

1. RECORD THE PRESENT WEIGHT OF THE PAC.

2. TAKE THE 25# WEIGHT AND PUT IT ON THE PAC SKID.

3. AGAIN RECORD THE WEIGHT OF THE PAC SKID PLUS THE 25# WEIGHT.

4. SUBTRACT #3 FROM #1

5. IF THE DIFFERENCE IS LESS THAN 24# OR GREATER THAN 26# WRITE IT UP IN MP2 TO HAVE THE

CERTIFICATE OF MAILING

I, Loretta Shaffer, certify that I sent the Administrative Consent Order, EPA Order No. EPA-5-09-113(a)-MN-02, by Certified Mail, Return Receipt Requested, to:

Tony Hill
Regulatory Compliance Coordinator
Olmsted Waste-to-Energy Facility
2122 Campus Drive SE, Suite 200
Rochester, Minnesota 55904

I also certify that I sent a copy of the Administrative Consent Order, EPA Order No. EPA-5-09-113(a)-MN-02, by First Class Mail to:

Jeff T. Connell, Manager
Compliance and Enforcement Section
Industrial Division
Minnesota Pollution Control Agency
520 Lafayette Road
St. Paul, Minnesota 55155-4194

on the 3rd day of Mar 2009.

Loretta Shaffer
AECAS (MN-OH)

CERTIFIED MAIL RECEIPT NUMBER: 7001 0320 0006 0186 0460